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September 30, 2021

VIA ECF

The Honorable Douglas E. Arpert
United State District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Gustavo Martinez v. City of Asbury Park, et al.,
Civil Action No. 20-8710 (AET-DEA)

Dear Judge Arpert:

This Firm represents Defendants City of Asbury Park, Daniel Savastano, Amir Bercovicz, Dewitt Bacon, and William Whitley (“Asbury Park Defendants”) in the above-captioned matter. The undersigned submits this letter jointly on behalf of all parties to again: (1) provide an update to the parties’ joint September 15, 2021 submission (ECF No. 97) regarding Plaintiff and the Asbury Park Defendants’ (“negotiating parties”) settlement negotiations, and (2) request an approximately two-week extension of the previously requested stay of discovery and pending scheduling order deadlines in this matter through and including October 15, 2021.

First, since our last correspondence, the negotiating parties have continued engaging in negotiations regarding the currently proposed settlement demand—including discussions regarding proposed changes to specific items discussed in the negotiating parties’ prior 1.5 hour teleconference. Based on discussions amongst the negotiating parties, the proposed changes will be communicated amongst the negotiating parties’ legal teams in short order in our continuing efforts to settle this matter.

Second, based on the foregoing reasons, the parties respectfully request an approximately two-week extension of the Court’s previously granted stay of discovery and pending scheduling order deadlines in this matter through and including October 15, 2021. At that time, the parties will either update the Court as to the prospective settlement or submit a proposed scheduling order. All parties consent to this joint request.

Respectfully submitted,

/s/ Joseph E. Lanzot
JOSEPH E. LANZOT, ESQ.
For the Firm

c: all counsel (via ECF)

